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VPNPD-91-047
NRC-91-010

January 31, 1991

Mr. A. Bert Davis, Regional Administrator
Office of Inspection & Enforcement,
Region III
U.S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Davis:

DOCKET NOS. 50-266 AND 50-301
REPLY TO NOTICE OF VIOLATION
INSPECTION REPORTS 50-266/90022 & 50-301/90022
POINT BEACH NUCLEAR PLANT

Your letter of December 24, 1990, transmitted the referenced inspection report. The report contained three Severity Level IV violations associated with procedural adherence. We received your letter on January 2, 1991. Because of the delay in receipt of this report, we requested, and received, permission from our Resident Inspector to respond to this notice 30 days after date of receipt.

Violation 1 stated that Operations refueling test procedure ORT 3, "Safety Injection Actuation with Loss of Engineered Safeguards AC" was performed with an actual reactor vessel level between 39% and 52%. Consequently, both safety injection pumps were disabled during the test with the reactor coolant system in a reduced inventory condition. The notice of violation also states that ORT 3 requires that reactor vessel level be greater than 52% prior to conducting the test. Additionally, operating procedure OP-4F, "Reactor Coolant System Reduced Inventory Requirements," requires that at least one safety injection pump is available for operation when reactor vessel level is less than 55%.

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We acknowledge that this situation, and the two others identified in the notice, are violations of our procedures. Please note that ORT 3, Initial Condition 3.2, requires reactor vessel level is greater than or equal to 52" (not percent) as contained in the notice of violation. This violation was identified to the on-duty operating shift on November 3, 1990, and documented on nonconformance report NCR N-90-244. Corrective actions taken have included revising procedure OP-4F to add a Precaution and Limitation (2.1) that defines a reduced inventory condition of the reactor coolant system as being "reactor vessel level <55% as indicated on LI-447/447A. This level is approximately three feet below the reactor vessel flange." Changes to OP-4F were complete with the issuance of Revision 4 effective December 28, 1990.

Additional corrective actions have included identifying and initiating similar changes to other related procedures. These procedures include RP-1A, Preparation for Refueling; OP-4A, "Filling and Venting the RCS;" OP-4D, "Draining the RCS;" OP-5A, "RCS Volume Control;" and OP-3C, "Hot Shutdown to Cold Shutdown." We also determined that a Human Performance Enhancement System (HPES) evaluation should be performed. This evaluation (HPES 90-006) has been initiated and will be complete by February 15, 1991.

Violation 2 states that operating procedure OP-5A, "Reactor Coolant Volume Control," in Section D, "3/4 Pipe Operation," is only for maintaining reactor vessel water level from 22% \pm 3%. Contrary to this, operators used this procedural section to raise reactor vessel water level from 22% to 60%. Corrective action in response to this violation will be the revision of this procedure to eliminate ambiguity and clarify its intended purpose. Procedure revisions will be completed by March 1, 1991.

Violation 3 deals with review of major procedure temporary changes that were not reviewed by the Manager's Supervisory Staff within 14 days. The first paragraph of this violation states, ". . .within 15 days." We assume this is a typographical error as the second paragraph of the notice of violation correctly states "14 days" as listed in our internal procedures.

We identified this violation on June 1, 1990, as documented in our internal nonconformance report NCR N-90-179. Since then, we experienced two similar incidents, as documented via NCRs N-90-274, dated September 28, 1990, and N-90-270, dated November 28, 1990. These similar incidents were not identified

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in your inspection report; however, we considered them carefully in developing our corrective actions.

Approximately one year ago, we recognized that there were problems associated with the area of temporary and permanent changes to procedures. A task force was assigned to study this problem and to recommend long-term corrective actions. One recommendation made by the task force was the need to develop an administrative procedure which addresses the issue of temporary changes.

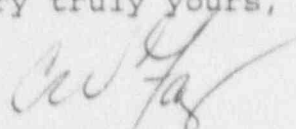
In accordance with this recommendation, proposed procedure PBNP 2.1.3, "Temporary Changes to Procedures," was drafted. We plan to issue this procedure by April 1, 1991. A provision of this proposed procedure is the independent tracking of the status of temporary procedure changes requiring review by the Manager's Supervisory Staff.

In addition, we reviewed the manner in which we schedule Manager's Supervisory Staff (MSS) meetings. Although the entire MSS meets twice per month on a pre-scheduled basis, we found that subcommittee meetings, for conducting business that a quorum of the MSS can effectively accomplish, such as procedure reviews, are not normally pre-scheduled. Pre-scheduling of MSS subcommittee meetings was initiated during the week of January 21, 1991.

We also recognized that temporary changes to major procedures are needed during refueling outages. These procedures have a different review/approval requirement in that these changes must be reviewed and approved prior to criticality of the next core. Accordingly, a standard note will be inserted into our refueling outage major item work list and progress approval to remind personnel of this requirement.

If you have any questions concerning this information, please contact us.

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Copies to Document Control Desk
Resident Inspector